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Filing date: **09/02/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222721
Party	Plaintiff Kansas City Royals Baseball Corporation
Correspondence Address	LINDSAY M RODMAN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES trademark@cll.com, jmn@cll.com, lmr@cll.com
Submission	Motion for Default Judgment
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Date	09/02/2015
Attachments	ROYALSINC- Motion for Default Judgment.pdf(16059 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 86/412,211

Filed: October 1, 2014

For Mark: ROYALSINC and Design

Published in the Official Gazette: March 10, 2015

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KANSAS CITY ROYALS BASEBALL :
CORPORATION,

Opposer, : Opposition No. 91222721

v. :

CCJACAPITAL LLC, :

Applicant. :

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Commissioner for Trademarks

Attn: Trademark Trial and Appeal Board

P.O. Box 1451

Alexandria, VA 22313-1451

MOTION FOR DEFAULT JUDGMENT

MOTION

Pursuant to Trademark Rule 2.106(a), Opposer hereby moves for a default judgment in this proceeding because Applicant has failed to file a timely answer. In the alternative, should this proceeding be reopened, Opposer requests that the discovery and trial periods be reset.

MEMORANDUM

Opposer's motion for default judgment should be granted because Applicant has failed to submit an answer to the Notice of Opposition. The order instituting this opposition was mailed by the Board on July 8, 2015. As the answer was due August 17, 2015 and no answer has been filed or received, and no good cause shown, a default judgment should be entered.

In the event, however, that this proceeding is reopened, Opposer requests that the discovery and trial periods be reset.

Dated: New York, New York
September 2, 2015

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on September 2, 2015, I caused a copy of the foregoing MOTION FOR DEFAULT JUDGMENT to be sent via First Class Mail, postage paid, to Applicant and Correspondent of Record, Ccjacapital LLC, 11700 W. Charleston Blvd., Bldg 170-338, Las Vegas, Nevada 89135-1573.

/Lindsay M. Rodman/
Lindsay M. Rodman